

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)
UNITED STATES OF AMERICA,)
)
) No. 4:09-cv-11986-DPW
v.)
)
\$18,380,697.75 et. al.)
)
)
 Defendants.)

JOINT MOTION TO CONTINUE STATUS CONFERENCE
AND HEARING ON PENDING MOTIONS

The United States of America, by its undersigned counsel, and Claimants Multinvest Casa de Bolsa, C.A. ("Multinvest"), Spectre Capital, Inc. ("Spectre"), and Spencer International Traders ("Spencer"), by their undersigned counsel, hereby move that this Court continue the status conference and hearing on pending motions, now scheduled for Tuesday, January 11, 2011, to a date convenient to the Court in March 2011, for the reasons set forth below.

The government and Claimant Multinvest (claimant to the *in rem* defendant \$18,380,697.75 in U.S. Currency) have reached a tentative settlement in this case. The proposed settlement, which, if approved by this Court, would moot the pending motions and make the status conference unnecessary, cannot be submitted to the Court without high-level approval by the Department of Justice, which is still pending.

The government and Claimant Spectre (claimant to the *in rem* defendant \$995,233.44 in U.S. Currency) have settled their

dispute in this case, and expect to file a joint motion soon for a final order of forfeiture and order releasing other property to carry out their agreed settlement.

The government and Claimant Spencer (claimant to the *in rem* defendant \$16,101.72 in U.S. Currency) have also settled their dispute in this case, and moved jointly on November 5, 2010, for a final order of forfeiture and order releasing other property to carry out their agreed settlement.

WHEREFORE, for all of these reasons, the United States, Multinvest, Spectre, and Spencer hereby request that this Court continue the status conference and hearing on pending motions from January 11, 2011, to a date convenient to the Court in March 2011.

Respectfully submitted,
CARMEN M. ORTIZ
U.S. Attorney

By: /s/Richard L. Hoffman
Richard L. Hoffman
Neil J. Gallagher, Jr.
Assistant U.S. Attorneys
1 Courthouse Way, Suite 9200
Boston, Massachusetts 02210
Telephone (617) 748-3279

Dated: January 6, 2011

MULTINVEST CASA DE BOLSA, C.A.
By its attorneys,
/s/Lee Stapleton
Lee Stapleton, Esq.
Baker & McKenzie LLP
Mellon Financial Center
1111 Brickell Avenue,
Suite 1700
Miami, Florida 33131

SPECTRE CAPITAL, INC.
By its attorneys,
/s/Thomas E. Butler
Thomas E. Butler, Esq.
Chadbourne & Parke LLP
30 Rockefeller Plaza
New York, NY 10112

SPENCER INTERNATIONAL TRADERS,
By its attorneys,
/s/Thomas E. Butler
Thomas E. Butler, Esq.
Chadbourne & Parke LLP
30 Rockefeller Plaza
New York, NY 10112

CERTIFICATE OF SERVICE

I hereby certify that I am filing the foregoing document via the ECF system, which will cause a copy to be sent to claimants' counsel by electronic mail.

Date: January 6, 2011 /s/Richard L. Hoffman
 RICHARD L. HOFFMAN
 Assistant U.S. Attorney